UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BSG RESOURCES (GUINEA) LIMITED, BSG RESOURCES (GUINEA) SARL, and BSG RESOURCES LIMITED,

Plaintiffs,

V.

GEORGE SOROS, OPEN SOCIETY
FOUNDATIONS, OPEN SOCIETY
INSTITUTE, FOUNDATION TO PROMOTE
OPEN SOCIETY, OPEN SOCIETY
FOUNDATION, INC., ALLIANCE FOR OPEN
SOCIETY INTERNATIONAL INC., OPEN
SOCIETY POLICY CENTER, and OPEN
SOCIETY FUND,

Defendants.

NOTICE OF APPLICATION FOR THE ISSUANCE OF INTERNATIONAL JUDICIAL ASSISTANCE (LETTER ROGATORY)

PLEASE TAKE NOTICE that upon the Application for the Issuance of a Request for International Judicial Assistance (Letter Rogatory) for the Production of Documents in the Federative Republic of Brazil submitted by Defendants George Soros, Open Society Foundations, Open Society Institute, Foundation to Promote Open Society, Open Society Foundation, Inc., Alliance for Open Society International, Inc., Open Society Policy Center, and Open Society Fund (collectively, "Defendants"), and exhibits thereto, and all other papers and proceedings herein, Defendants will move this Court, before the Honorable Judge Andrew J. Peck, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order

issuing a Letter Rogatory addressed to the appropriate judicial authority of the Federative Republic of Brazil.

Dated: October 27, 2017 New York, New York Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

By: /s/ Elizabeth J. Bower Joseph T. Baio Benjamin P. McCallen James Fitzmaurice

787 Seventh Avenue New York, NY 10019 Telephone: (212) 728-8000 jbaio@willkie.com

Elizabeth J. Bower

1875 K Street, N.W. Washington, D.C. 20006 Telephone: (202) 303-1000 ebower@willkie.com

Attorneys for Defendants

TO:

GREENBERG TRAURIG, LLP

Louis M. Solomon 200 Park Avenue New York, New York 10166 (212) 801-6500 lsolomon@gtlaw.com

Attorneys for Plaintiffs